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VIA ECF

Magistrate Judge Leda Dunn Wettre
U.S. District Court, District of New Jersey
Martin Luther King Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *MacDonald, et al. v. CashCall, Inc., et al.*, No. 2:16-cv-02781-MCA-LDW

Dear Magistrate Judge Wettre:

Pursuant to the December 7, 2018 Amended Scheduling Order (ECF No. 83) and January 31, 2019 Text Order (ECF No. 91), Plaintiffs write in advance of the telephonic status conference scheduled for March 5, 2019, to report on the status of the case.

Since the December 14, 2018 hearing regarding the parties' discovery disputes, Plaintiffs have taken the 30(b)(6) deposition of Defendant CashCall, Inc., as well as the depositions of individuals J. Paul Reddam and Delbert Meeks. Pursuant to the Court's Order, Plaintiff Spearman supplemented her discovery responses regarding past legal proceedings.

On February 8, 2019 Plaintiffs filed their Motion for Class Certification Pursuant to Fed. R. Civ. P. 23, and briefing will proceed on the approved schedule set forth in the Court's Order (ECF No. 92) with the Motion Day of May 6, 2019.

As discussed at the December 14 hearing, if Plaintiffs' motion is granted, Plaintiffs will request a limited discovery period for the purpose of obtaining class-wide damages information, i.e., loan payment details for each class member. Defendants objected to producing the data prior to a class being certified, but have stipulated that they have the data and could produce it later in response to court order or request. (Stip., ECF No. 93-18.) Plaintiffs will also request that the Court set deadlines for expert disclosures and discovery at that time. (*See* Sched. Order, ECF No. 56 ¶ VI.)

We look forward to speaking with you.

Sincerely,

NICHOLS KASTER, PLLP

A handwritten signature in black ink that reads "A. Prakash".

Anna P. Prakash